

JUDGE'S COPY

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Copy

UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF PENNSYLVANIA

YUDAYA NANYONGA,

Plaintiff,

vs.

IMMIGRATION NATURALIZATION
SERVICES, et als.,

Defendants

CIVIL NO: 1:00CV-1034
(JUDGE CALDWELL)

FILED
HARRISBURG

OCT 18 2000

MARY E. DIANDREA, CLERK
Per _____
DEPUTY CLERK

PLAINTIFF, YUDAYA NANYONGA'S
MOTION FOR ENLARGEMENT OF TIME

Plaintiff, Yudaya Nanyonga, by and through counsel, hereby requests a brief extension of time to November 2, 2000 to respond to Defendant, INS Federal Rule Civil Procedure 12 b (6) motion and states the following support thereof:

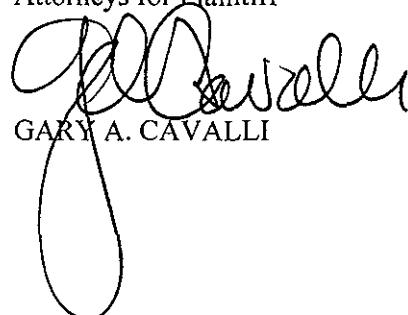
- 1) Plaintiff, Yudaya Nanyonga, was an alien detainee being held at the York County Prison, York, Pennsylvania. Presently, Nanyonga resides at 586 Purce Street, Hillside Township, New Jersey.
- 2) Nanyonga has sued various INS and York County Prison officials.
- 3) Plaintiff's response to Defendant's motion would be due on or about October 18, 2000.
- 4) Plaintiff, Yudaya Nanyonga is in the process of reviewing its file to respond to the motion of counsel unfortunately, due to trial scheduling conflicts we cannot respond within the original 20 day time requirement.
- 5) Accordingly, in order to file an appropriate response, Plaintiff requests that this Court to grant a twenty day extension of time.

6) Counsel has conferred with Mr. Terez, attorney for Defendant, INS who has consented to a 20 day.

Wherefore, Plaintiff, Nanyonga requests this Court to grant her motion for a twenty day extension of time to respond.

Respectfully submitted,

POPE, BERGRIN & VERDESCO, P.A.
Attorneys for Plaintiff



GARY A. CAVALLI

Dated: October 16, 2000

UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF PENNSYLVANIA

YUDAYA NANYONGA,

Plaintiff,

vs.

IMMIGRATION NATURALIZATION
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CERTIFICATE OF CONCURRENCE

On October 14, 2000, undersigned counsel requested concurrence from Joseph Terez, counsel for the Defendant, INS, in a motion for enlargement of time. Counsel concurs in the motion. This certification is being provided in accordance with M.D. Pa. Local Rule 7.1.

Respectfully submitted

POPE, BERGRIN & VERDESCO, P.A.
Attorney for Plaintiff

GARY A. CAVALLI

Dated: October 16, 2000

UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF PENNSYLVANIA

YUDAYA NANYONGA, :
Plaintiff, :
vs. : CIVIL NO: 1:00CV-1034
IMMIGRATION NATURALIZATION : (JUDGE CALDWELL)
SERVICES, et als., :
Defendants :
:

CERTIFICATE OF SERVICE BY MAIL

The undersigned hereby certifies that she is an employee in the Law Firm of Pope, Bergrin & Verdesco, P.A. and is the person of such age and discretion as to be competent to serve papers.

That on October 16, 2000, she served a copy of the attached

PLAINTIFF'S MOTION FOR ENLARGEMENT OF TIME

by placing said copy in postpaid envelope addressed to the person hereinafter named, at the place and address stated below, which is the last known address, and by depositing said envelope and contents in the United States Mail at Newark, New Jersey.

Addressee:

Joseph J. Terz
Assistant U.S. Attorney
217 Federal Building
228 Walnut Street
P.O. Box 11754
Harrisburg, Pa. 17108

Dated: October 16, 2000



CAROL SEEGER
Legal Assistant